

REMARKS

Careful consideration has been given by the applicant to the Examiner's comments and rejection of the claims, as set forth in the outstanding Office Action, and favorable reconsideration and allowance of the application, as amended, is earnestly solicited.

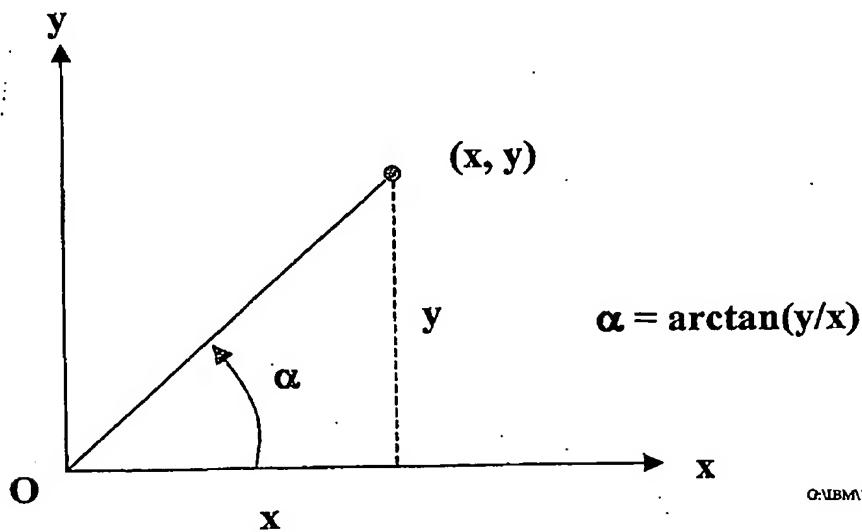
Applicant notes the Examiner's rejection of Claims 1-20 under 35 U.S.C. §112, second paragraph, for failing to comply with the written description requirement.

In particular, applicant notes the Examiner's indication that the terms of Table 1 are not explained, which are critical to map the reference points to the actual points.

Accordingly, in view of the comments set forth by the Examiner, and the Examiner's requirements that the specification must explain how the variables are used in Equations 3 and 4, and how they determine coefficients to map reference points to actual points on the panel must be elucidated.

Accordingly, applicant respectfully submits the following in response to the Examiner's comments in that regard:

On Page 2 of the Office Action, the Examiner has misunderstood the term $D_x y/x$ as "partial derivative of the function y/x . In the invention, D_x is a constant, and y/x is the tangent of the angle formed by the x-axis and the vector from the origin to a point (x, y) in the Cartesian coordinate system as illustrated graphically below.



In addition to the foregoing, in order to derive further information explanatory with regard to the subject matter of the claims, wherein Claims 11-20 are rejected as describing subject matter not clearly elucidated in the specification, applicant herewith has amended the paragraphs on Pages 8, 9, 10 and 11 of the disclosure to more clearly set forth the mathematical aspects in support of the claims. The amendments being presented to the specification do not in any manner introduce new subject matter, but are merely for the purpose of clarifying various points, so as to meet the Examiner's requirements in that regard.

Furthermore, concerning the Examiner's objections to Claim 11 in that the latter is a single means claim, applicant, in order to meet the Examiner's requirements in that regard, has introduced the subject matter of Claim 12 into Claim 11, thereby further clarifying the subject matter of that particular claim.

Similarly, with regard to the preceding claims, applicant has also implemented formal amendments to the claims, which are also deemed to meet all of the requirements under 35 U.S.C. §112, while concurrently patentably distinguishing over the art, as represented by Frey, et al., U.S. Patent No. 5,691,909.

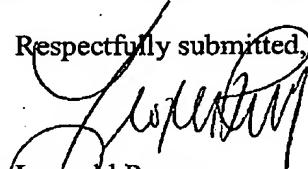
In particular, applicant respectfully submits that the claims clearly and patentably distinguish over Frey, et al., inasmuch as the latter do not in any manner concern themselves with the method of creating a mathematical model taken into consideration the translational and rotational compensations caused by panel rotation, shrinkage, stretching, expansions and distortions during pressing and thermal processing of the panel.

The algorithm, which is utilized and described by the present applicant in clear terminology in the amended specification, facilitates the accurate prediction of the location of the at least one work location subsequent to the processing of the panel.

The foregoing is not at all considered in Frey, et al., which rather relates to the functions of time and area motions of the machine components as a function of time and the shape of the tool. Consequently, the method and apparatus described in Frey, et al. is completely unlike that of the present invention and the claims are deemed to clearly and patentably distinguish thereover.

Moreover, with regard to the claims, wherein the Examiner has rejected Claims 1-4 under 35 U.S.C. §112, second paragraph, all of the essential steps have been fully set forth in the claims and are supported in the amended specification, as presented herein.

Accordingly, in view of the foregoing, applicant respectfully submits that all of the grounds of rejection have been fully met and the present application is deemed to be in substantial order for allowance, in view of which applicant respectfully requests the issuance of the Notice of Allowance. However, in the event that the Examiner has any queries concerning the instantly submitted Amendment, applicant's attorney respectfully requests that he be accorded the courtesy of possibly a telephone conference to discuss any matters in need of attention.

Respectfully submitted,

Leopold Presser
Registration No. 19,847
Attorney for Applicant

SCULLY, SCOTT, MURPHY & PRESSER
400 Garden City Plaza – Suite 300
Garden City, New York 11530
(516) 742-4343

LP:jy